

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

Lois Harris		CHAPTER 13
	<u>Debtor(s)</u>	
PENNSYLVANIA HOUSING FINANCE AGENCY		
	<u>Movant</u>	
vs.		NO. 17-16232 MDC
Lois Harris		
	<u>Debtor(s)</u>	
William C. Miller Esq.		11 U.S.C. Section 362
	<u>Trustee</u>	

**STIPULATION ALLOWING FOR SECURED CREDITOR,**  
**PENNSYLVANIA HOUSING FINANCE AGENCY, TO FILE A LATE PROOF OF CLAIM**

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

1. Debtor filed the instant Chapter 13 Bankruptcy on September 12, 2017.
2. The deadline for filing claims was set as January 23, 2018, and the deadline for government claims was March 11, 2018.
3. On October 9, 2018, Pennsylvania Housing Finance Agency ("Movant") filed a Motion to Allow Filing of a Proof of Claim.
4. The Parties have now reviewed the claim in depth to come to a resolution of this matter.
5. This matter is to be resolved as per the following terms:
  - a. Within fourteen (14) days of the filing of this Stipulation, Secured Creditor is to file its Proof of Claim setting forth total arrears in the amount of \$1,100.32 and a total secured claim in the amount of \$29,287.98.

6. The parties agree that the foregoing signature shall be considered an original signature.

Date: 10/10/18

By: Rebecca A. Solarz, Esquire  
Rebecca A. Solarz, Esquire  
Attorney for Secured Creditor

Date: 10/10/18

By: [Signature]  
Timothy Zearfoss, Esquire  
Attorney for Debtor

Date: 10/23/18

By: [Signature]  
William Miller  
Chapter 13 Trustee

*NO POSITION*  
**\*without prejudice to any  
trustee rights or remedies**

Approved by the Court this 25th day of October, 2018. However, the court retains discretion regarding entry of any further order.

Magdelina D. Coleman

Bankruptcy Judge  
Magdelina D. Coleman